

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20326-CR-KMM

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE LORQUET

Defendant.

_____/

MOTION TO WITHDRAW AS COUNSEL TO DEFENDANT

Undersigned counsel moves to withdraw as counsel to the defendant Andre Lorquet.

Because of irreconcilable differences, undersigned counsel moves to withdraw as Mr. Lorquet's attorney in this matter. The comments to Rule 4-1.2 of the Florida Bar state the following: "[a] lawyer and a client may disagree about the means to be used to accomplish the client's objectives. The lawyer should consult with the client and seek a mutually acceptable resolution of the disagreement. If such efforts are unavailing and the lawyer has a fundamental disagreement with the client, the lawyer may withdraw from the representation."

Here, the undersigned lawyer and client have a fundamental disagreement. As a result, the undersigned lawyer seeks to withdraw from representing the client, in this case Mer. Lorquet. To protect the client's confidences and attorney client privilege, the undersigned is not disclosing the communications and disagreements

between counsel and Mr. Lorquet. Nevertheless, they are fundamental and therefore the undersigned finds that withdrawal is necessary.

Wherefore, Henry P. Bell and Bell Rosquete Reyes Esteban, PLLC respectfully request that the Court enter an order permitting their withdrawal as counsel and discharging them from further responsibility in representing Mr. Lorquet.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 6, 2023, a true and correct copy of the foregoing has been furnished electronically via CMCEF to all counsel of record.

Respectfully submitted,

BELL ROSQUETE REYES ESTEBAN, PLLC

Henry P. Bell

Fla. Bar No. 090689

999 Ponce De Leon Blvd.

Suite 810

Coral Gables, Florida 33134

Telephone: (305) 570-1610

Facsimile: (305) 570-1599

Email: hbelle@bresq.com

Counsel to Andre Lorquet

By: s/Henry P. Bell
Henry P. Bel

CC: Andre Lorquet – FDC Miami